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July 27, 2017

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Jason Galanis et al
16-cr-0371-4 (RA)

Dear Judge Abrams:

We represent Bevan Cooney, one of the defendants in above-referenced case. This letter is intended to follow-up on our previous motion to join, so far as applicable to defendant Bevan Cooney, the Emergency Letter Motion made by counsel representing Devon Archer on July 26, 2017 (Dkt. 191). We have now had the opportunity to confirm that the Government just as in the case of Mr. Archer, has similarly produced to all defendants in this case the entire contents of Mr. Cooney's e-mail account, save certain documents that the government has segregated for privilege review. The Government has acknowledged this in their reply to Mr. Archer's motion (Doc. 195). Even a cursory review of the most recent discovery production confirms that the Government had produced to all the defendants in this case a vast amount of Mr. Cooney's personal, medical and business communications that are completely unrelated to any criminal charges in this case. The Government, in their reply motion does not appear to dispute this contention as it relates to their most recent production.

For the reasons set forth in Mr. Archer's motion (Dkt. 191) because Mr. Cooney's case presents the same issues and concerns as defendant Archer, we respectfully request the same relief, that the Court Order that the defendants return the Email Production to be replaced with a production solely consisting of responsive emails upon the completion of the Government's review. Thank you for your consideration.

Respectfully submitted,

/S/

Paula J. Notari
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Attorneys for Bevan Cooney

cc: (via ECF & email) AUSAs Brian Blais, Rebecca Mermelstein, Aimee Hector and Andrea Griswold